



DEPT. OF TRANSPORTATION

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IOWA UTILITIES BOARD
IOWA DEPARTMENT OF COMMERCE

September 13, 2000
File: OPS

Dockets Facility
U.S. Department of Transportation
Room PL-401
400 Seventh St. SW
Washington, DC 20590-0001

RSPA-98-4957-25

RE: Docket No. RSPA 98-4957, Notice 19 - Pipeline Safety: Revision of Natural Gas Transmission and Gathering Pipeline Incident and Annual Report Forms.

Dear USDOT/RSPA:

On August 2, 2000, the U.S. Department of Transportation, Research and Special Programs Administration (RSPA) published in the Federal Register a Notice and request for comment in the above referenced docket. The Iowa Utilities Board is the agency responsible for the pipeline safety programs of the State of Iowa, and which enforces the natural gas pipeline safety standards of 49 CFR Parts 191, 192, and 193 under certification granted by the Department of Transportation pursuant to 49 USC 60105. This proceeding is therefore relevant to the Board's interests and the following comments are offered.

The General Accounting Office and the RSPA Office of Inspector General have both expressed concern that detail is lacking in the pipeline incident reports currently filed with RSPA. The Inspector General in particular recommended that the report form be clarified and expanded. In addition, many of the following comments are equally applicable to both the current and proposed forms. Therefore it is appropriate for RSPA to modify these forms.

Detailed instructions are available for completing the current RSPA report forms. However, no instruction material was provided for completing the proposed forms. This somewhat hampered review. It may be that some of our concerns are, or could be, addressed in the instructions.

Comments on Draft Revised OPS Report Forms:

INCIDENT REPORT – GAS TRANSMISSION AND GATHERING SYSTEMS

1. Part A, Item 1.c: Clarify that the operator's address is what is wanted here, not the location of the failure. If the operator's headquarters address is what is wanted, the form or instructions should so state.

2. Part A, Item 3: The form needs more precise and useful location information for an incident. "City" or "County" is much too broad. The Mile Post/Valve Station or Survey Station No. may give more precision but are of use only if the operator's maps are also available. Location description options should include the address of the accident site, and the section, township and range using the government land survey system. Either would provide a location that is both accurate and in a widely recognized format.

The form or instructions should allow location by parish instead of county for the benefit of locations in states where a parish rather than county system is used.

3. Part A, Item 4: This item was found confusing at first. Suggest using "N/A" rather than "None", moving "None (N/A)" and "Other" to the end of the item, and reversing their order.

4. Part A, Item 5.d: "High Consequence Area" is a term not yet formally defined but under consideration in Docket No. RSPA-99-6355. Does this mean the new form cannot go into use until a definition is adopted in that docket?

5. Part A, Item 5.e: "Gas ignited" may or may not include an explosion. When an explosion has occurred some responders might check both boxes, others only one. To assure consistency the choices should be "Gas ignition – no explosion" and "Explosion."

6. Part C, Item 3: The inclusion of Plastic as a material is supported. Iowa has several plastic pipelines which serve as a sole source of supply to small towns, and which are transmission pipelines under the purpose section of the definition in 49 CFR Part 192.3. This addition would allow any incident on such pipelines to be reported on the appropriate form.

However, the form contains no sections for reporting failure modes unique to plastic pipe. It should ask at minimum if a plastic pipe failure was ductile or brittle, and if the failure was at a joint if it was a heat-fusion (butt or socket), electrofusion, or mechanically coupled connection.

7. Part C, Item 4: The question should ask for both the year the pipeline was originally constructed, and the year that the failed component was installed. This would provide both the age of the line and information on whether the failure occurred on the original construction or a subsequent repair or modification.

8. Part D, Item 6: Does "Manufactured by" refer to the pipe or the valve? Perhaps should ask about both or at least clarify what information is desired.

9. Part F2, Items 5 and 9: "Frost heave" is a ground movement and would be more appropriately placed under "Earth Movement" (Item 5) than "Temperature" (Item 9).

10. Part F2, Item 8: To prevent error in this item a method needs to be devised to distinguish a Fire/Explosion which caused the failure to occur from a Fire/Explosion that was caused by the failure. Perhaps "Fire/Explosion prior to incident?"

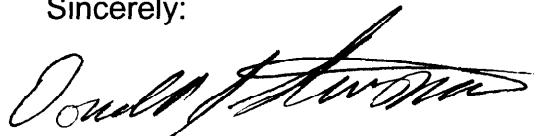
11. Part F2, Item 12: It is not immediately clear what an Operator Encroachment might be, or how it might be distinguished from Incorrect Operation in Part F4.
12. Section F3, Item 19: Presumably the instructions will spell out the full text of the welding acronyms used in this item?
13. Part F4, Item 21: "Dresser" is a specific brand name for certain couplings made by the Dresser company. On the form this item needs to be generic. Suggest "Mechanical Coupling" be used instead.
14. Part F4, Item 23.a: Due to liability considerations it seems unlikely that any operator would check off an admission of inadequate procedures or safety practices, or of failure to follow procedures. Alternative language should be investigated.

ANNUAL REPORT – GAS TRANSMISSION AND GATHERING SYSTEMS

Part A, Item 3: The proposed requirement that a separate report be filed for each state in which the operator has pipeline is strongly supported. States have an interest in the extent and nature of the pipelines within their state. This interest is not limited to states serving as interstate agents for the RSPA Office of Pipeline Safety. Several high profile accidents in recent years have led to calls for information on pipelines to be more available, and this form requirement is a step in that direction.

Thank you for the opportunity to comment in this proceeding. If there are any questions or a need to contact someone concerning these comments, feel free to do so at 515-281-5546 (phone), 515-281-5329 (fax), or at dstursm@max.state.ia.us.

Sincerely:

A handwritten signature in black ink, appearing to read "Donald J. Stursma", with a stylized flourish at the end.

Donald J. Stursma, P.E.
Manager
Safety and Engineering Section